

BOSTANY LAW FIRM PLLC

40 WALL STREET
NEW YORK, NEW YORK 10005

TEL: 212-530-4400

FAX: 212-530-4488

NEW JERSEY OFFICE

ONE GATEWAY CENTER
NEWARK, NJ 07102

March 15, 2016

Hon. Barbara C. Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *Six Dimensions, Inc. v. Perficient, Inc. et. al.*
15-cv-8309 (PGG)(BCM)

Your Honor:

I represent the Plaintiff in this case arising primarily out of allegations of solicitation and raiding of my client's key employees. A courtesy copy of the Second Amended Complaint is respectfully attached to the hard copy of this letter.

Currently pending are several non-dispositive applications that appear to fall within the parameters of the March 14, 2016 referral. *See* Docket Entries 50, 53 and 66. These were filed as "Joint Letter" applications pursuant to Rule 4E of the Individual Practice Rules of Hon. Paul G. Gardephe which reads as follows:

E. Discovery Disputes. Unless otherwise directed, counsel should describe their discovery disputes in a single letter, jointly composed. Separate and successive letters will be returned, unread. Strict adherence to Fed. R. Civ. P. 37(a)(1), the "meet and confer" rule, is required, and should be described in the joint submission as to time, place, and duration, naming the counsel involved in the discussion. The joint letter shall describe concisely the issues in dispute and the respective position of each party, with citations for supporting authority. Letters regarding discovery disputes should be filed in accordance with Rule 1(A) above. Where a formal discovery motion is necessary, follow Local Civil Rule 37.2.

Judge Gardephe's Rule in this regard seems quite similar to Your Honor's Rule II(B) which we will of course follow for any further discovery applications. I respectfully ask that the Joint Letters (courtesy copies attached) be deemed requests for Pre-Motion Conferences as required by Your Honor's Individual Practice Rule II(B).

Respectfully,

s/John P. Bostany